

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

ERIN E. KIS, on behalf of herself and all others
similarly situated,

Plaintiff,

v.

COVELLI ENTERPRISES, INC.,

Defendant.

Case No. 4:18-cv-00054-JG

CHELSEA ROMANO, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

COVELLI ENTERPRISES, INC.,

Defendant.

Case No. 4:18-cv-00434-JG

**PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF SETTLEMENT
CLASS, APPROVAL OF FLSA SETTLEMENT, APPOINTMENT OF PLAINTIFFS'
COUNSEL AS CLASS COUNSEL, AND APPROVAL OF THE PROPOSED
NOTICES OF SETTLEMENT AND CLASS ACTION SETTLEMENT PROCEDURE**

For the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Class, Approval of FLSA Settlement, Appointment of Plaintiffs' Counsel as Class Counsel, and Approval of the Proposed Notices of Settlement and Class Action Settlement Procedure, the declarations of Plaintiffs' Counsel, and other supporting documents, Plaintiffs respectfully request that the Court enter an order:

- (1) granting preliminary approval of the class settlement;
- (2) provisionally certifying the Rule 23 class for settlement purposes;

- (3) appointing Plaintiffs' Counsel as Class Counsel;
- (4) approving the proposed Notices of Settlement and Claim Form attached as Exhibits A, B, C, and D to the Settlement Agreement and direct their distribution; and
- (5) approving the FLSA settlement and payment distribution process for FLSA Collective Members.

For the Court's convenience, a Proposed Order is attached as **Exhibit F** to the Settlement Agreement.

Dated: June 28, 2019

Respectfully submitted,

By: s/ Drew Legando

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CERTIFICATION OF SERVICE

I hereby certify that on June 28, 2019, the above document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system and by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

s/ Drew Legando
Drew Legando